

UNITED STATES DISTRICT COURT

for the

District of

Division

Case No.

2:19cv 685

(to be filled in by the Clerk's Office)

Kristina Merle Larson

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Jury Trial: (check one)

☐ Yes☒ No"see attached"American Home Products, Wyeth-Ayerst Laboratories

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Kristina Merle Larson

Street Address

200 Kirby Shores Dr. Apt A-2

City and County

Suffolk, Suffolk County

State and Zip Code

VA, 23434

Telephone Number

757-338-0333

E-mail Address

none

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

Defendant No. 1

Name

American Home Products; Wyeth - Ayerst (Pfizer)

Job or Title *(if known)*

Street Address

235 East 42nd St., New York, NY 10017

City and County

New York

State and Zip Code

New York 10017

Telephone Number

212-733-6162

E-mail Address *(if known)*E danielle.rosen@pfizer.com
This is the only email I know.

Defendant No. 2

Name

N/A

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

Defendant No. 3

Name

N/A

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

Defendant No. 4

Name

N/A

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

Defendant:

American Home Products, Wyeth-Ayerst Laboratories, now owned by Pfizer

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

- ☒ Federal question ☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

B. If the Basis for Jurisdiction Is Diversity of Citizenship

violation of American Disabilities Act, wrongful termination, failure to provide a necessary reasonable accommodation & unnecessary harassment & bullying.

1. The Plaintiff(s)**a. If the plaintiff is an individual**

The plaintiff, (name) _____, is a citizen of the State of (name) _____.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, (name) _____, is a citizen of the State of (name) _____. Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, *(name)* _____, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____.
Or is incorporated under the laws of *(foreign nation)* _____, and has its principal place of business in *(name)* _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

III. Statement of Claim

I was employed w/ Hyeth as a sales rep. ~~I was~~ diagnosed with ~~an~~ condition and prescribed medication. The medication made me very sick. My supervisor noticed changes in me and met with me at Duncen Donuts to talk. He offered me the opportunity to go out on short term disability. We never discussed what was wrong with me. I only told him that I had recently seen a doctor and was diagnosed with something, that I had begun treatment & I believed I would be better fine. However, the treatment made me very, very ill. It did not make me better. I was however, doing my job fine, just not ^{I was} able to communicate at the level I had previously.

Things were going okay at work but I knew I was not okay. I was making sales just fine but I was suffering. I decided to see a psychiatrist. Someone, another sales representative, saw me in the psychiatrist office.

Two days later my supervisor asked to see me again, so we met. ~~He said~~ At that time I told him I had seen a psychiatrist who had told me I had previously been misdiagnosed. This new doctor ~~was~~ ^{was} very familiar with my particular problem & knew he could help me. However, my supervisor's attitude totally changed when I told him I had been diagnosed by a psychiatrist. He began yelling & trying to bully me into resigning. He was yelling loudly, there were at IHOP, people could hear. He pulled out a sheet of paper & asked me to write my resignation immediately. I did not. I later that day emailed him what my doctor said was a reasonable accommodation. However, I was totally ignored by my supervisor & fellow employees. I was not included in team meetings or phone calls.

He said
he had
another sales
rep
out on
temporary
disability &
that he was
very willing
to cooperate.

(2)

III. Cont.

He would not email me or return my calls. ~~I was~~
~~fract~~ Until he called me and left a voice
mail for me on Sunday, April 01, 2001; April Fool's Day.

Prior to that, the only time he contacted me was to
show up at my home at odd hours of the night
& early morning, knowing I was a single lady,
he would bang on my door. He tried to break
into my company car. I believe I was
treated differently due to the fact that
my problem was psychiatric in nature as
compared to my fellow employ, who had a
physical disability.

IV. Relief.

At the time of my dismissal I was earning almost \$70,000.00 annually, plus a company car, full benefits and unlimited free gasoline. I am asking for \$140,000.00 x 20 years, which I believe totals \$1.4 million. I would also like a car of equal value to the new Grand Prix I was driving as my company car. It had 6,000 miles on it when it was given to me. I would like \$600,000.00 in punitive damages due to the emotional + psychological stress of being hasty to change factors due to loss of insurance, humiliation, + even an extended hospitalization due to all of this stress.

This totals \$2 million plus a car. I also would like my ~~bonus~~ bonus which I never received, which would have been at least \$10,000.00 + I can tell you how I got that number.

The domino effect the loss of this position caused in my life has been traumatic + has prevented me from prospering in many ways.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 12-08-2019

Signature of Plaintiff

Printed Name of Plaintiff


Kristina Merle Larson**B. For Attorneys**

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address